

CAUSE NO. 24-0753-C

LA VENTANA RANCH OWNERS
ASSOCIATION, INC.

IN THE COUNTY COURT

VS.

AT LAW NO. 1

JAKOB SKELTON AND STEPHANIE
CHANG A/K/A STEPHANIE SKELTON

HAYS COUNTY, TEXAS

**COUNTER-DEFENDANT LA VENTANA RANCH OWNERS ASSOCIATION, INC.'S
ORIGINAL ANSWER TO COUNTER-PLAINTIFFS JAKOB SKELTON AND
STEPHANIE CHANG A/K/A STEPHANIE SKELTON'S COUNTERCLAIMS**

NOW COMES La Ventana Ranch Owners Association, Inc., Counter-Defendant, in the above styled and numbered cause, and files this, its Original Answer, saying:

I. General Denial

1. Subject to such stipulations and admissions as may hereinafter be made, Counter-Defendant asserts a general denial as is authorized by Rule 92 of the Texas Rules of Civil Procedure. Counter-Defendant respectfully requests that Counter-Plaintiffs be required to prove the charges and allegations made against Counter-Defendant by a preponderance of the evidence as is required by the Constitution and Laws of the State of Texas.

WHEREFORE, PREMISES CONSIDERED, Counter-Defendant La Ventana Ranch Owners Association, Inc. prays that, upon a final hearing hereof, Counter-Plaintiffs take nothing of and from Counter-Defendant and that Counter-Defendant receives all costs of Court and such other and further relief, both at law or in equity, to which Counter-Defendant may show itself to be justly entitled.

Respectfully submitted,

**THORNTON, BIECHLIN,
REYNOLDS & GUERRA, L.C.**

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BY



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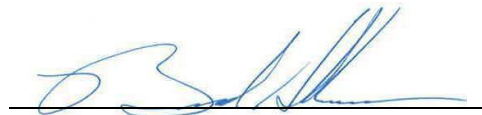
Attorney for Counter-Defendant La Ventana
Ranch Owners Association, Inc.

CERTIFICATE OF SERVICE

A true and correct copy of the above and foregoing instrument has been properly delivered pursuant to Texas Rules of Civil Procedure, on April 4, 2025, to the following counsel of record:

Adam Pugh
Cagle Pugh
4301 Westbank Dr., Suite A150
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Melissa Carr
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